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UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

SECURITIES AND EXCHANGE) Civil Action No.
COMMISSION,) 1:21-cv-00260-PB
)
Plaintiff,)
) VOLUME 1
vs.) (Pages 1 to 283)
)
LBRY, INC.,)
)
Defendant.)
_____)

CONFIDENTIAL VIDEOTAPED DEPOSITION OF
ALEX GRINTSVAYG
1155 AVENUE OF THE AMERICAS
NEW YORK, NEW YORK
THURSDAY, MARCH 17, 2022

REPORTED BY:
ELBIA BAIREZ
JOB NO. 220317LHR

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09:46 1 A. LBRY.

2 Q. What is LBRY, Inc.?

3 A. A company.

4 Q. And what does -- what is -- what

09:46 5 services, if any, does LBRY, Inc. provide?

6 A. We work on the LBRY protocol.

7 Q. Anything else?

8 A. I'm not sure what you mean.

9 Q. Well, the -- what product does LBRY,

09:46 10 Inc. have?

11 A. The -- the application, like the LBRY

12 application.

13 Q. What are those?

14 A. There's a desktop app, there's a

09:47 15 mobile app, there's a web app. I think that's

16 it.

17 Q. And who are LBRY, Inc.'s customers or

18 clients, if any?

19 MR. DIXON: Objection. Vague.

09:47 20 A. Yeah. I mean, I'm not sure what you

21 mean.

22 Q. Who consumes LBRY, Inc.'s product or

23 services?

24 A. People.

09:47 25 Q. Is there like a certain segment of

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09:48 1 Q. Who is that?

2 A. Jeremy Kauffman.

3 Q. And Kauffman is K-U-F-F-M-A-N (sic)?

4 A. Yes.

09:49 5 Q. Have you ever had a different title
6 or position at LBRY, Inc.?

7 A. No.

8 Q. Was your title ever the chief
9 infrastructure officer?

09:49 10 A. No -- um -- maybe. I don't remember.
11 It's possible.

12 Q. Is there currently a chief
13 infrastructure officer at LBRY, Inc.?

14 A. No.

09:49 15 Q. Were your -- I'm just -- when did you
16 start at LBRY, Inc.?

17 A. In -- in 2016.

18 Q. And have your duties and
19 responsibilities changed since when you started
09:49 20 until -- until the present?

21 A. I don't think so. But I -- I
22 guess -- there might have been another CTO. And
23 then I became CTO eventually. I don't remember
24 part of it all.

09:50 25 Q. Who is Mike Zargham?

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09:50 1 A. Mike used to work at LBRY and was --
2 was CTO. Officially. For a short period of
3 time.

4 Q. And you replaced him as CTO?

09:50 5 A. I think so, yeah.

6 Q. So if I can just get into a little
7 bit of the structure of the employees at LBRY,
8 Inc.

9 How many employees are there
09:50 10 currently?

11 A. I'm not sure.

12 Q. Ballpark.

13 A. Yeah, I don't remember. It's like
14 under 30.

09:51 15 Q. Do any of them work on the LBRY,
16 Inc.'s technology?

17 A. Yes.

18 Q. And -- but they don't report to you?

19 A. Yes.

09:51 20 Q. The LBRY employees who work on
21 technology, do they report to somebody else?

22 A. Yes.

23 Q. To whom do they report?

24 A. To Jeremy.

09:51 25 Q. Does everyone just report to Jeremy?

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09:54 1 9:54 a.m. We are off the record.
2 (At this time, a discussion
3 was held off the record.)
4 VIDEOGRAPHER: Time right now is
10:00 5 10:00 a.m. We are back on the record.
6 BY MR. MOORES:
7 Q. How many websites does LBRY, Inc.
8 maintain?
9 A. I'm not sure exactly. At least
10:00 10 three.
11 Q. What are those?
12 A. LBRY.com, LBRY.tech, Odysee.com.
13 Yeah, there might be others.
14 Q. I'd like to talk about those.
10:01 15 LBRY.com, what is the purpose of that
16 website?
17 A. To be the website for the company.
18 And the protocol.
19 Q. Does LBRY provide information to the
10:01 20 public through LBRY.com?
21 A. Yes.
22 Q. Is that part of the purpose, to
23 provide information about LBRY to the public?
24 A. Yes.
10:01 25 Q. What is LBRY.tech?

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10:06 1 how to contribute, like API documentation.

2 Q. What is an API?

3 A. Application programming interface.

4 Something like that.

10:06 5 Q. In layman's terms, what is that?

6 A. It's a way for programs to talk to
7 each other.

8 Q. You identified another website called
9 Odysee.com.

10:07 10 What is that?

11 A. That's an application.

12 Q. A web-based application?

13 A. Yes.

14 Q. And is there somebody or people at
10:07 15 LBRY who are primarily responsible for
16 Odysee.com's maintenance?

17 A. I don't know.

18 Q. Who do you think at LBRY would know?

19 MR. DIXON: Objection. Calls for
10:07 20 speculation.

21 A. Yeah, I -- I would have to guess
22 it's -- Julian might know. If I was guessing.

23 Q. Who is Julian?

24 A. Julian Chandra.

10:08 25 Q. And what does he do at LBRY?

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10:23 1 A. That lots of people use it.
2 Q. Anything else?
3 A. I don't know.
4 Q. You don't know because you don't
10:23 5 remember or --
6 A. Yeah, I don't remember. It was a
7 long time ago.
8 Q. Currently at LBRY, who are the people
9 that you work with most?
10:24 10 A. Jeremy and some of the developers.
11 Q. Who are the developers?
12 A. Jack, Victor -- you want me to list
13 all the developers at LBRY?
14 Q. The ones you work with the most.
10:25 15 A. Roy. Mostly with them.
16 Q. What is Jack's last name?
17 A. Robison.
18 Q. What is he working on?
19 A. He is working on the -- the hub.
10:25 20 Q. What's that?
21 A. It's a server that lets -- a service
22 that lets people use LBRY without having a full
23 copy of the blockchain.
24 Q. Is there a hardware involved on the
10:25 25 hub?

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10:25 1 A. What do you mean?

2 Q. Between software and hardware,

3 hardware being a server, a computer, some sort

4 of apparatus.

10:26 5 Is -- does the hub use hardware or is

6 it merely a piece of software?

7 A. It's both.

8 Q. So are there -- does the hub run on

9 LBRY servers?

10:26 10 A. Yes.

11 Q. Servers owned by LBRY, Inc.?

12 A. Yes. It runs on other people's

13 servers as well.

14 Q. What is Victor's last name?

10:26 15 A. Shyba.

16 Q. What is he working on?

17 A. I think he's working on the -- the

18 DHD right now.

19 Q. What's the DHD?

10:26 20 A. Distributed hash table.

21 Q. And what does that do?

22 A. It lets you find peers to download

23 content from.

24 Q. What's Roy's last name?

10:27 25 A. Li.

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10:27 1 Q. What is he working on?
2 A. The blockchain.
3 Q. When you refer to it as the
4 blockchain, what do you mean by that?
10:27 5 A. It's called LBCD.
6 Q. Is that different than the protocol?
7 A. It's part of the protocol.
8 Q. So LBCD, does that refer to a
9 repository?
10:28 10 A. I guess, yes.
11 Q. I mean, what is a repository?
12 A. It's a copy of the code.
13 Q. Where does LBRY, Inc. keep its
14 repositories?
10:28 15 A. On GitHub and on our computers.
16 Q. So Ray Li is working on --
17 A. Roy.
18 Q. Sorry.
19 Roy lee is working on the blockchain
10:28 20 otherwise known as LBCD?
21 A. Yes.
22 Q. What other roles besides CTO do you
23 have at LBRY, Inc., if any?
24 A. Like official roles?
10:28 25 Q. Yes.

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11:02 1 Q. And who -- when was the desktop
2 application created?

3 A. I don't remember the exact date.

4 Q. When was the mobile application
11:03 5 created?

6 A. Also don't know the exact date.

7 Q. Who created the desktop application?

8 A. Like which person?

9 Q. Well, let's go with did LBRY create
11:03 10 the desktop application?

11 A. Yes.

12 Q. Who works on the desktop application
13 currently at LBRY?

14 A. Jessop.

11:03 15 Q. How do you spell that?

16 A. J-E-S-S-O-P.

17 Q. Is that the first or last name?

18 A. First name.

19 Q. What's the last name?

11:03 20 A. Breth, B-R-E-T-H.

21 Q. Does anybody else work on that
22 desktop application with him?

23 A. Other people can make changes to it.
24 But he's in charge.

11:03 25 Q. Do you ever make changes to the

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11:03 1 desktop application?

2 A. Yes.

3 Q. And how do you do that?

4 A. I write code.

11:04 5 Q. What language is the code in?

6 A. JavaScript.

7 Q. And where is it saved?

8 A. It's on like a bunch of people's
9 computers.

11:04 10 Q. Is the desktop application code saved
11 on GitHub?

12 A. It's there as well.

13 Q. Is the version on people's
14 computer -- sorry.

11:04 15 Where is the master version saved?

16 A. LBRY's master version is on GitHub.

17 Q. And do you have to go to GitHub
18 itself in order to type in changes to the code?

19 A. No.

11:04 20 Q. How does that work that -- how do you
21 change the master version on GitHub for the
22 desktop application?

23 A. I make the changes on my computer and
24 then I push them to GitHub.

11:05 25 Q. If you can just explain what push

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11:05 1 them to GitHub means.

2 A. I copy them to GitHub. But like it

3 happens automatically. Like I run a command and

4 they get copied to GitHub.

11:05 5 Q. Do you have to talk to anybody else

6 at LBRY before you push those changes to GitHub?

7 A. No.

8 Q. Does -- if Jessop is going to make a

9 change to the desktop application, does he have

11:05 10 to talk to anybody else at LBRY before he pushes

11 changes to GitHub?

12 A. No.

13 Q. Do you have like editorial rights to

14 the master LBRY version of the desktop

11:05 15 application on GitHub?

16 A. What do you mean?

17 Q. So you can just edit it yourself, the

18 desktop application code, on GitHub?

19 A. Yes.

11:06 20 Q. You don't need to talk to anybody

21 else, you don't need to get approval from

22 anybody else to make that change?

23 A. No.

24 Q. And I think you are saying that

11:06 25 Jessop Barth -- Berth --

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11:06 1 A. Breth.

2 Q. He doesn't need to talk to anybody
3 else at LBRY in order to make those changes on
4 the desktop application, correct?

11:06 5 A. Yes.

6 Q. Who else at LBRY has the ability to
7 make changes to the desktop application code on
8 GitHub?

9 A. Anyone else.

11:06 10 Q. Any LBRY employee can make changes to
11 the desktop application code on GitHub?

12 A. I believe so.

13 Q. And how long has that been the
14 operating procedure at LBRY, Inc.?

11:07 15 A. I'm not sure.

16 Q. Has it always been that way for the
17 desktop application in your -- your memory?

18 A. As far as I remember, yes.

19 Q. Can anyone outside of LBRY make edits
11:07 20 to LBRY's master version of the desktop
21 application code?

22 A. Yes.

23 Q. Who is that?

24 A. Anyone who is code.

11:07 25 Q. So hypothetically speaking, if I

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11:07 1 grabbed John's laptop, went to GitHub, I can
2 make changes to LBRY's master version of the
3 code for the desktop application right now?

4 A. Yes.

11:08 5 Q. And it would change whatever version
6 that somebody downloads of the LBRY's desktop
7 application?

8 A. No.

9 Q. Why not?

11:08 10 A. It has to be merged first.

11 Q. Who -- can I -- again, hypothetically
12 speaking, can I merge code into the master
13 version of LBRY's desktop application?

14 A. No.

11:08 15 Q. Who can merge the code?

16 A. For LBRY's copy?

17 Q. For the master version on GitHub,
18 yes.

19 A. For LBRY's master version, it would
11:08 20 be --

21 Q. Correct. For LBRY's master version
22 on GitHub, who can merge the code for the
23 desktop application?

24 A. People at LBRY.

11:08 25 Q. So people outside of LBRY can't merge

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11:08 1 the code for LBRY's master version?

2 A. No. But they can make their own.

3 Q. Right. They can copy but -- because

4 it's open source, they can copy the code and

11:09 5 make their own desktop, that would be the -- the

6 Dickson, you know, LBRY desktop, you know,

7 version?

8 A. Right.

9 Q. Now, below -- is -- so with the

11:09 10 mobile application, is that the same to be true,

11 that anyone at LBRY can change the LBRY's master

12 version of the mobile application and merge the

13 file, but no one outside of LBRY can do that?

14 MR. DIXON: Objection to form.

11:09 15 A. I think so.

16 MR. DIXON: You can answer.

17 A. I -- I think so.

18 Q. Is it written down anywhere?

19 A. I don't know.

11:09 20 Q. Was it somewhere in like GitHub that

21 says who has the ability to merge files?

22 A. Yes.

23 Q. And is the rules in GitHub viewable

24 by the public?

11:10 25 A. I don't know.

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11:10 1 Q. So you understand what I mean? Like
2 who can actually change LBRY's master version?
3 Is it observable by the public on who has those
4 -- those rights?

11:10 5 A. Yeah, I don't know.

6 Q. Do you know where it would be on
7 GitHub if you needed to find that out?

8 A. No.

9 Q. Below the desktop/mobile app box,
11:10 10 there's an arrow that points down to the --
11 another box which says, "SDK," and then in
12 paren, "one per user," close paren.

13 Do you see that?

14 A. Yes.

11:10 15 Q. What is SDK?

16 A. SDK stands for software development
17 kit.

18 Q. What is this box here, on Exhibit 91,
19 SDK supposed to symbolize?

11:11 20 A. That's the code that we call the SDK.
21 That's running on your computer.

22 Q. On the user's computer?

23 A. Yes. LBRY user.

24 Q. And what does the SDK software do?

11:11 25 A. It speaks to LBRY protocol and

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11:11 1 participates in the network.

2 Q. So when a user downloads the desktop
3 application, is the SDK bundled in that
4 download?

11:11 5 A. Yes.

6 Q. And without the SDK, the desktop
7 application wouldn't be able to function?

8 A. It would still do some things. But
9 it couldn't talk to the network, the LBRY

11:12 10 network.

11 Q. So LBRY's desktop application and
12 mobile application predominantly are for the
13 consumption of videos; is that correct? What is
14 currently.

11:12 15 A. Maybe.

16 Q. Is it something --

17 A. Sure. yes.

18 Q. Something other than video?

19 A. Yeah. It's any content.

11:13 20 Q. Right.

21 But what is the most content that
22 those applications can access at the moment?

23 A. I'm not sure.

24 Q. So on the LBRY network, right, there
11:13 25 are -- there's content that in theory publishers

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11:14 1 go back to the desktop, mobile app box here in
2 front of you. And there's this arrow that
3 starts at the top right-hand corner of the box
4 and snakes all around. And then says, "Search"
11:14 5 and comes around and points to a lighthouse
6 search box on the far right-hand side.

7 Do you see that?

8 A. Yes.

9 Q. That arrow sort of snakes around.

11:15 10 What is Lighthouse search?

11 A. Lighthouse is a server that provides
12 the search capability.

13 Q. Who owns that server?

14 A. Odysee.

11:15 15 Q. Does the Lighthouse search server
16 also work for the desktop application?

17 A. Yes.

18 Q. And Odysee is a subsidiary -- is a --
19 is a company itself; is that right?

11:15 20 A. Yes. I'm not sure.

21 Q. So Odysee is a part of LBRY; is that
22 correct?

23 A. No. I'm not sure, honestly.

24 Q. Have you heard of the expression
11:16 25 subsidiary?

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11:16 1 A. Yes.

2 Q. Is Odysee a subsidiary of LBRY?

3 A. I don't know the like legal status.

4 Q. So Lighthouse search is a server that

11:16 5 provides a search function; is that right?

6 A. Yes.

7 Q. And how does it do that?

8 A. It uses software called

9 Elasticsearch, which is open search software,

11:16 10 and there's an API, call it, you get search

11 results.

12 Q. So there's software running on those

13 servers to facilitate the search?

14 A. Yeah.

11:17 15 Q. So that would be sort of when you

16 have hardware and software sort of working

17 together?

18 A. Right.

19 Q. Who created Lighthouse?

11:17 20 A. LBRY.

21 Q. Who works on Lighthouse now?

22 A. I don't know.

23 Q. So back on the desktop mobile app

24 box, there's another arrow that starts from the

11:17 25 right-hand side of the box that goes up and

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11:26 1 that. It's an icon.

2 Q. What is the purpose of the icon?

3 A. It differentiates that line from
4 other lines.

11:26 5 Q. So it's essentially just like
6 creating a different color or something --

7 A. Yeah.

8 Q. -- that differentiates them? Okay.

9 What is the reflector cylinder?

11:26 10 A. Reflector is a server. It reflects
11 content.

12 Q. What does reflecting content mean
13 within the concept of the LBRY network?

14 A. It stores content that people can
11:26 15 download.

16 Q. So there's hardware involved in the
17 reflector --

18 A. Yes.

19 Q. -- servers?

11:27 20 A. Yes.

21 Q. And who owns those servers?

22 A. LBRY.

23 Q. What's the purpose of reflecting
24 content?

11:27 25 A. To help people download it.

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11:27 1 Q. How does the reflector help people
2 download it?

3 A. They talk to LBRY protocol. And they
4 download the content.

11:27 5 Q. Is that only for content that LBRY
6 publishes?

7 A. No. It's for any content.

8 Q. Is that because it speeds up the
9 download for users?

11:27 10 MR. DIXON: Objection as to form.

11 Excuse me. Objection as to form.

12 Q. All right. So the reflector, you
13 said, it enables content download.

14 Is one of the things it does, speed
11:28 15 up the ability of users to download content?

16 A. Yes.

17 Q. Coming out of the reflector is an
18 arrow coming out of a box saying -- called
19 "Video CDN."

11:28 20 What is video CDN?

21 A. CDN is content delivery network. So
22 video content delivery network.

23 Q. Is that software?

24 A. It's both.

11:28 25 Q. What is the hardware component of the

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11:28 1 video CDN?

2 A. It's servers.

3 Q. And does LBRY own any servers that
4 are part of the video CDN?

11:29 5 A. Yes.

6 MR. DIXON: Alex, could you try to
7 speak up a little bit if you can.

8 THE WITNESS: Yes. Thanks for
9 reminding me.

11:29 10 Q. What's the purpose of the video CDN?

11 A. To speed up video download.

12 Q. Is there software that is necessary
13 to run the reflectors?

14 A. Yes.

11:29 15 Q. And who created that software?

16 A. LBRY.

17 Q. Who works on the reflector software
18 today?

19 A. I don't know.

11:29 20 Q. Is there anybody at LBRY that works
21 on that software?

22 A. I've -- I don't know.

23 Q. Have you made changes to the
24 reflector software yourself?

11:30 25 A. Me personally, I think so.

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11:30 1 Q. Who created the video CDN software?

2 A. I think it was LBRY.

3 Q. Who works on the video CDN software
4 today at LBRY?

11:30 5 A. I'm not sure.

6 Q. All right. So coming out of the SDK
7 box, there's an arrow that points to a cloud
8 bubble that says, "SDK peers."

9 Do you see that?

11:30 10 A. Yes.

11 Q. What is an SDK peers?

12 A. A peer is another computer running
13 the SDK.

14 Q. And then below that, there's an arrow
11:31 15 that points to another bubble which is "DHT."
16 In parens is "UDT," close parens.

17 Do you see that?

18 A. Yes.

19 Q. I think you said DHT was distributed
11:31 20 hash -- what's the T stand for?

21 A. Table.

22 Q. Table.

23 What does the DHT do?

24 A. It helps you find peers to download
11:31 25 content from.

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11:31 1 Q. Is that software?

2 A. Yes.

3 Q. Who created the DHT for the LBRY
4 network?

11:31 5 A. LBRY.

6 Q. And who works on the DHT today? You
7 said it was Victor; is that right?

8 A. Yes.

9 Q. Below the SDK box, there is another
11:32 10 box -- an arrow pointing to a box called "Hub."
11 And I think you talked a little bit about the
12 hub beforehand. Jack Robinson is working on the
13 hub now?

14 A. Robison. Yes.

11:32 15 Q. Robison.

16 Who created the hub?

17 A. LBRY.

18 Q. Is the hub requiring hardware in
19 addition to software?

11:32 20 A. Yes.

21 Q. And does LBRY own -- sorry.
22 Is it a server?

23 A. Yes.

24 Q. And does LBRY own the server upon

11:32 25 which the hub operates?

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11:32 1 A. Some of them.

2 Q. What does the hub do again?

3 A. It lets the -- it lets you interact

4 with the blockchain without having a full copy

11:33 5 of it.

6 Q. Now, there's an arrow to the left of

7 the hub box. Points to the hub box. And within

8 that box it says, "Elasticsearch."

9 Do you see that?

11:33 10 A. Yes.

11 Q. What's that Elasticsearch for?

12 A. Also for search.

13 Q. Similar to the Lighthouse search?

14 A. Yes.

11:33 15 Q. And so is there servers that LBRY

16 owns upon which the Elasticsearch operates for

17 the purposes of the hub?

18 A. Yes.

19 Q. So on the left side of the SDK, one

11:33 20 per user box, there's "Segment/metabase

21 analytics."

22 Do you see that?

23 A. Yes.

24 Q. And what are segment/metabase

11:33 25 analytics?

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11:39 1 Q. What is a blockchain node?

2 A. It's the piece of software that

3 implements the blockchain piece of the protocol.

4 Q. Who created the blockchain node?

11:40 5 A. A bunch of people.

6 Q. Who are those?

7 A. I don't know all of them.

8 Q. Who -- who is the -- the people that

9 contributed the most? At least we'll start with

11:40 10 the people at LBRY.

11 Who at LBRY contributed to the

12 blockchain node's categorization?

13 A. Do you want like a list of everybody?

14 Q. I mean at LBRY -- the -- created it.

11:40 15 So at the beginning.

16 A. No one at LBRY created it.

17 Q. No one currently at LBRY?

18 A. No one currently at LBRY.

19 Q. Were they at LBRY at the time they

11:40 20 created it?

21 A. No.

22 Q. Talk about Jimmy Kiselak?

23 A. I wouldn't say Jimmy created it.

24 Q. So who created it?

11:41 25 A. I mean, like a ton of people

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11:41 1 contributed to it. I don't know if there's like
2 one creator.

3 Q. And they were not at LBRY at the
4 time?

11:41 5 A. No.

6 Q. All right. So give me some names.
7 Who -- who was for the creation of
8 blockchain -- sorry. Let me -- when was the
9 blockchain node created?

11:41 10 A. I don't know.

11 Q. Would the blockchain node have to
12 have been created prior to the launch of
13 protocol?

14 A. Yes.

11:41 15 Q. And when was launch of the protocol?

16 A. If I remember correctly, June 2016.

17 Q. So somebody would have had to have
18 created blockchain node prior to June of 2016,
19 correct?

11:42 20 A. Yes.

21 Q. Who works on the blockchain node
22 today?

23 A. Roy. Roy Li.

24 Q. Anyone else at LBRY?

11:42 25 A. Not like primarily.

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11:42 1 Q. Did you have a hand in the creation
2 of blockchain node?

3 MR. DIXON: Objection as to form.

4 Q. Did you contribute to the creation of
11:42 5 blockchain node?

6 Probably have two hands. Typing at
7 the keyboard, right. You are not a one-hand
8 type person? No.

9 A. Um -- what's the question?

11:42 10 Q. Sure.

11 Did you contribute to the creation of
12 the blockchain node?

13 A. Yes.

14 Q. Who did you work with on the creation
11:43 15 of blockchain node?

16 A. Jimmy and Jeremy.

17 Q. All right. So I think I've covered
18 most of this stuff on the left-hand side of this
19 slide chart. I want to go over to the Odysee
11:43 20 stack side.

21 And under "User," there's a box
22 called "Browser."

23 Do you see that?

24 A. Yes.

11:43 25 Q. What is the browser?

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11:43 1 A. It's software that runs on your
2 device that lets you access the internet.

3 Q. And the browser was not something
4 that LBRY created, correct?

11:44 5 A. Correct.

6 Q. So the browser is oftentimes Internet
7 Explorer, Google Chrome, something like that?

8 A. Yes.

9 Q. Below that is the Odysee API, which I
11:44 10 think we talked about. To the right is
11 something called Postgres, P-O-S-T-G-R-E-S.

12 Do you see that?

13 A. Yes.

14 Q. What is that?

11:44 15 A. It's a relational database. Server
16 software.

17 Q. What does it do?

18 A. It stores data.

19 Q. What type of data?

11:44 20 A. Whatever data you put in there.

21 Q. What is LBRY putting in Postgres?

22 A. Data that it needs to run the Odysee
23 service.

24 Q. Can you give me a couple of examples
11:44 25 of what that data is?

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11:45 1 A. Like -- I'm going to have to think
2 about it for a sec.
3 Like notifications sent to users or
4 like logins. Like -- the kind of things you'd
11:45 5 need to -- to use Odysee.
6 Q. Use meaning the user would need to
7 use Odysee; is that correct?
8 A. Yes.
9 Q. As opposed to sort of the developer
11:45 10 would need or is it both?
11 A. I'm not sure.
12 Q. Notifications, what are those?
13 A. When something happens that a user
14 might be interested in, Odysee's -- the
11:46 15 application notifies them.
16 Q. Can you give me an example?
17 A. When a piece of content is published
18 by a creator you follow.
19 Q. Through what medium does the
11:46 20 notification get sent?
21 A. I think it's e-mail or in the
22 application.
23 Q. Are notifications ever sent to
24 desktop application users?
11:47 25 A. I'm not sure.

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11:47 1 Q. Are notifications sent to mobile
2 application users?

3 A. I'm not sure.

4 Q. Who at LBRY created the Postgres?

11:47 5 A. No one.

6 Q. Is there a server that's involved in
7 Postgres where all the data is stored?

8 A. Yes.

9 Q. Who owns the server?

11:47 10 A. Odysee.

11 Q. And there's software that operates
12 that server; is that right?

13 A. Yes.

14 Q. Like these notifications are probably
11:47 15 automated, right?

16 A. Yes.

17 Q. It's not like somebody is actually
18 typing them out?

19 A. Yes. Yes.

11:47 20 Q. Who developed the software that runs
21 on the Postgres service?

22 A. The open source community. There's
23 probably like thousands of developers.

24 Q. So no one at LBRY?

11:48 25 A. Right.

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11:51 1 A. I'm not sure.

2 Q. Who created the hub software for the
3 Odysee stack?

4 A. LBRY.

11:51 5 Q. And does Jack Robison run or maintain
6 the hub software for the Odysee stack?

7 A. No.

8 Q. Who does that?

9 A. I'm not sure.

11:51 10 Q. What day-to-day role do you have in
11 the Odysee stack?

12 A. None.

13 Q. And when did that start?

14 A. I'm not sure what you mean.

11:52 15 Q. When did you cease having a
16 day-to-day role in Odysee?

17 A. I've -- I never had a day-to-day role
18 at Odysee.

19 Q. So this Odysee stack, have you made
11:52 20 changes to any of the software on the Odysee
21 stack?

22 A. Yeah.

23 Q. What have you made changes to?

24 A. The SDK. And the blockchain.

11:52 25 Q. The blockchain noted at the bottom of

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11:52 1 the stack?

2 A. Yes.

3 Q. Anything else?

4 A. I don't remember.

11:52 5 Q. When was the last time you made a
6 change to any of the software on the Odysee
7 stack?

8 A. I don't remember.

9 Q. What part of the Odysee stack
11:53 10 software is not open source?

11 A. I don't know.

12 Q. Is some of it not open source?

13 A. Yes.

14 Q. You just don't know what part of it
11:53 15 is?

16 A. Yeah, I don't know which is which.

17 Q. The hubs on the Odysee stack, they
18 run on servers; is that right?

19 A. Yes.

11:53 20 Q. And who owns those servers?

21 A. For the Odysee stack?

22 Q. Correct.

23 A. Odysee.

24 Q. What is the software code Go?

11:54 25 A. What do you mean? Oh --

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11:54 1 Q. Software language, I should say.
2 A. Yeah, Go is a program language.
3 Q. And what efforts are you engaged in
4 in transferring any of the LBRY stacks software
11:54 5 code to Go?
6 A. I made the decision that we should do
7 that.
8 Q. When did you make the decision?
9 A. A while ago.
11:54 10 Q. Is that more than a year ago?
11 A. I'm not sure.
12 Q. Why did you make the decision to
13 change the software code to Go?
14 A. I thought it would be better that
11:55 15 way.
16 Q. Why would it be better?
17 A. It's easier to develop it.
18 Q. Who drafted Exhibit number 91, the
19 text of it?
11:55 20 A. I'm not 100 percent sure.
21 Q. Who did you provide the diagram to
22 for the purposes of the Exhibit number 91?
23 A. I shared it with the whole company.
24 Q. Did someone ask you to create this
11:56 25 diagram?

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12:16 1 A. Maybe.

2 Q. What do you mean by "maybe"?

3 A. Yeah. I think it's good to know what

4 the mission of the company is.

12:17 5 Q. So below the header "Ecosystem

6 Overview," about midway down the page, there's

7 these circles. And on the left, there's one

8 that says, "ChainQuery."

9 What is that?

12:17 10 A. It's a service that lets you query

11 blockchain data.

12 Q. And who runs that service?

13 A. Anyone can run it.

14 Q. Like, is it like a company operates

12:17 15 this service or -- how is it --

16 A. It's -- it's open source. Anyone can

17 run it.

18 Q. So LBRY copied the software and

19 figured out how to apply to LBRY blockchain?

12:17 20 MR. DIXON: Objection as the form.

21 A. Yeah, I'm not sure. Could you

22 rephrase that?

23 Q. Sure. Sure. Sure.

24 How did LBRY come to use ChainQuery?

12:18 25 A. LBRY wrote ChainQuery.

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12:18 1 Q. And who wrote it?

2 A. I think Mark Beamer wrote it.

3 Q. Is Mark Beamer still at LBRY?

4 A. He's at Odysee.

12:18 5 Q. And when was ChainQuery first
6 created?

7 A. I don't remember.

8 Q. Is it more than two years ago?

9 A. Maybe.

12:19 10 Q. Who would know? Besides maybe Mark?

11 A. You can look on GitHub.

12 Q. So ChainQuery is saved on GitHub?

13 A. The code for ChainQuery is saved on
14 GitHub.

12:19 15 Q. And on GitHub, it will talk about
16 when a certain code was drafted -- or was
17 created?

18 A. Yes.

19 Q. And then it will also indicate when
12:19 20 edits were made?

21 A. Yes.

22 Q. What's -- on the right-hand side
23 there's "Wallet server."

24 Do you see that?

12:19 25 A. Yes.

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12:21 1 A. Yes.

2 Q. When was the hub created?

3 A. Sometime in the last two years.

4 Q. When was the wallet server created?

12:21 5 A. Before that.

6 Q. Who created the wallet server?

7 A. A bunch of people.

8 Q. At LBRY?

9 A. Some of them are at LBRY.

12:22 10 Q. So then, at the time that it was

11 created, were the people who created the wallet

12 server at LBRY?

13 A. Yes.

14 Q. What does the wallet server do?

12:22 15 A. It lets you interact with the

16 blockchain without having a full copy.

17 Q. Why is it called wallet?

18 A. Because there's a thing called a

19 wallet that it mostly works with.

12:22 20 Q. So we talked about the wallet sync

21 beforehand.

22 How does the wallet sync interact

23 with the wallet server?

24 A. It doesn't.

12:23 25 Q. Does the wallet server have a role in

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12:30 1 sort of fields or forms on the website of LBRY
2 tech and the -- Exhibit number 92 is trying to
3 capture all three of them.

4 So that's why you see blockchain,
12:31 5 data network and applications. And each one of
6 those is expanded in succession. So I'm
7 directing your attention to the last -- front
8 side of the last page of Exhibit number 92,
9 where it has expanded data network -- I'm sorry,
12:31 10 expanded applications.

11 Do you see that?

12 A. Yes.

13 Q. So there are three applications that
14 are listed here. Android, desktop and spe.ch,
12:31 15 S-P-E, dot, C-H.

16 Do you see that?

17 A. Yes.

18 Q. I don't think we've talked about
19 spe.ch yet today.

12:31 20 What is that?

21 A. It is a -- or it was. It doesn't
22 exist anymore. But it was a website where
23 people could upload images that would go to the
24 LBRY network.

12:32 25 Q. So it was a web application?

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12:32 1 A. Yes.

2 Q. And when did it cease to exist?

3 A. I don't remember.

4 Q. Why did it cease to exist?

12:32 5 A. Because it was replaced.

6 Q. What was it replaced by?

7 A. Either LBRY TV or Odysee.

8 Q. So was spe.ch the sort of original

9 web application for the LBRY network?

12:33 10 A. What do you mean by "original"?

11 Q. Preceded all other web applications

12 for the LBRY network.

13 A. Yes.

14 Q. Whose decision was it to end spe.ch?

12:33 15 A. I'm not sure.

16 Q. Was it your decision to end spe.ch?

17 A. No.

18 Q. Was it Jeremy Kauffman's decision to

19 end spe.ch?

12:33 20 A. Maybe.

21 Q. Well, who else is there? Like who

22 else would -- except LBRY, who has the authority

23 to end an application?

24 A. It would be Julian.

12:34 25 Q. So when was spe.ch ended, then?

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12:44 1 UptimeRobot's check.

2 Q. And what does the red bar mean?

3 A. I think it means that it didn't
4 respond.

12:44 5 Q. Do you know what the orange bar
6 means?

7 A. No.

8 Q. Or the faded or light green bar
9 means?

12:44 10 A. I'm not sure.

11 Q. So the second service listed is
12 ChainQuery, Claim Tree sync.

13 Do you see that?

14 A. Yes.

12:44 15 Q. What is the Claim Tree sync?

16 A. I'm not sure.

17 Q. Next one is Explorer.

18 You see that?

19 A. Yes.

12:45 20 Q. What is Explorer?

21 A. It's a web app that lets people see
22 blockchain information.

23 Q. And who maintains that website, the
24 Explorer website?

12:45 25 A. What do you mean, maintains?

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12:55 1 MR. DIXON: Objection as to form.

2 A. What do you mean, reflect content?

3 Q. Well, what is -- what's the reflector

4 cylinder do on Exhibit number 91?

12:55 5 A. It accepts content that people choose

6 to send to it.

7 Q. Are there servers owned by LBRY that

8 are -- exist in Asia that host content?

9 MR. DIXON: Objection as to form.

12:56 10 A. I'm not sure.

11 Q. Who would know the answer to that

12 question? Who is in charge of the technology at

13 LBRY?

14 MR. DIXON: Objection as to form.

12:56 15 A. Who is in charge of the technology at

16 LBRY?

17 Q. Yeah.

18 A. Me.

19 Q. So where are the servers that LBRY

12:56 20 owns? Where are they located?

21 MR. DIXON: Objection as to form.

22 A. All over the world.

23 Q. And are there any servers in Asia

24 that host content that are owned by LBRY?

12:57 25 MR. DIXON: Objection as to form.

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12:57 1 A. There's Odysee servers that host
2 content.

3 Q. That are owned by Odysee?

4 A. Yes.

12:57 5 Q. And are located in Asia?

6 A. What do you mean by "host content"?

7 Q. So back on Exhibit number 91, we have
8 the reflector, right? What does the reflector
9 do?

12:58 10 A. It accepts content that people choose
11 to send to it.

12 Q. So what does "accepts content" mean?

13 A. When you send it content, it -- it
14 accepts it.

12:58 15 Q. What does it do with it?

16 A. It stores it.

17 Q. For what purpose?

18 A. For others to download it.

19 Q. Are there servers owned by Odysee
12:58 20 located in Asia that accept content and store it
21 for other people to download?

22 MR. DIXON: Objection as to form.

23 A. I don't think so.

24 Q. And what's the basis of your
12:59 25 understanding that there are no servers of that

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01:00 1 Q. Can you give me an example of a way
2 in which you do use it?
3 A. To make content available for others
4 to download.

01:01 5 Q. And does LBRY host content?
6 MR. DIXON: Objection as to form.
7 A. Servers host content.
8 Q. LBRY servers host content?
9 A. Some of them.

01:01 10 Q. Approximately how much content in
11 terms of memories do LBRY servers host?
12 A. In terms of memories?
13 Q. Yeah. Like bytes.
14 A. I don't know.

01:01 15 Q. In terms of the number of videos, how
16 much content do LBRY servers host?
17 MR. DIXON: Objection as to form.
18 A. I -- I don't know.
19 Q. How would I -- if you had to answer
01:02 20 that question, how would you do it?
21 MR. DIXON: Objection as to form.
22 A. I would have to check. I'd have to
23 look.
24 Q. Where would you look?
01:02 25 A. I'd have to look at all the servers

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01:55 1 LIT-E-0002498. It is dated May 12, 2016.

2 Do you have Exhibit number 94 in
3 front of you?

4 A. Yes.

01:55 5 Q. All right. In Exhibit 94, Tipping in
6 LBC, there's a reference to a new team member,
7 Alex Grin.

8 Is that you?

9 A. Yes. Probably.

01:55 10 Q. And so it says that you had set up an
11 LBC tip bot on LBRY's Slack.

12 Do you see that?

13 A. Mm-hmm.

14 Q. Did you, in fact, set up an LBC tip
01:56 15 bot on LBRY's Slack?

16 A. I don't remember doing it. But
17 probably, yes.

18 Q. All right. Well, what is a tip bot?

19 A. A tip bot is a program that people
01:56 20 can use to send each other tips.

21 Q. And specifically in this instance, is
22 it tips in LBC?

23 A. Yes.

24 Q. And LBC is LBRY credit?

01:56 25 A. Yes.

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01:56 1 Q. And sending them on LBRY's Slack,
2 what is LBRY's Slack?
3 A. It's a chat program we use.
4 Q. And can someone actually send an LBC
01:56 5 through Slack?
6 A. No.
7 Q. How does it work?
8 A. You send a message asking the tip bot
9 to send a person a tip. And then the bot does
01:56 10 it like on the blockchain.
11 Q. Was this set up so that LBRY could
12 send LBC to individuals?
13 MR. DIXON: Objection as to form.
14 A. Yes.
01:57 15 Q. Did the tip bot allow non-LBRY
16 persons to send LBC to LBRY's Slack?
17 MR. DIXON: Objection as to form.
18 A. I don't remember what restrictions
19 there were.
01:57 20 Q. Why did you set up or -- why was the
21 LBC tip bot set up?
22 A. Um -- I don't know the exact reason.
23 Q. What's one of the reasons, if -- if
24 there are more than one?
01:58 25 A. It might have been because it's fun.

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02:16 1 want to do work on several issues at once in the
2 same area.

3 Q. So it was more efficient if you sort
4 of grouped them together for the development
02:16 5 work to fix them?

6 A. That's -- yeah, one example. Yeah.
7 (Exhibit 96 was marked for
8 identification.)

9 Q. Sir, you've been handed what has been
02:17 10 marked as Exhibit number 96. It is a one-page
11 document front and back. It begins on Bates
12 number SEC-LBRY LIT-E-0005102. It's entitled
13 "HF1807: A hard fork on July 9, 2018."

14 Do you recognize Exhibit number 96?

02:17 15 A. Yes.

16 Q. What is it?

17 A. It's a blog post that I wrote.

18 Q. Where was it posted?

19 A. On LBRY's website.

02:18 20 Q. Was it posted anywhere else?

21 A. I don't remember. It could have
22 been.

23 Q. Does LBRY maintain a website
24 LBRY.ihope?

02:18 25 A. Yes.

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02:18 1 Q. And was that discontinued at some
2 point?

3 A. Yes.

4 Q. When was that?

02:18 5 A. I don't remember the date.

6 Q. Why was it discontinued?

7 A. We switched to LBRY.com.

8 Q. Why was that?

9 A. We liked it better.

02:18 10 Q. Whose decision was that?

11 A. I think it was Jeremy's.

12 Q. So what is an HF1807?

13 A. A name.

14 Q. What does the HF stand for?

02:19 15 A. Hard fork.

16 Q. What does the number 1807 refer to?

17 A. The date.

18 Q. And so the post was originally
19 June 5, 2018; is that right?

02:19 20 A. Seems right from this.

21 Q. And then there was a couple of
22 updates?

23 A. That's what it looks like.

24 Q. Was it -- this post, how -- sorry.

02:19 25 Would LBRY promote its posts in any

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02:19 1 other format other than posting on its website?
2 MR. DIXON: Objection as to form.
3 A. We -- we might post them to Twitter.
4 Q. What about Facebook?
02:20 5 A. Yeah, probably.
6 Q. Would you post links in any Discord
7 channel?
8 A. It's possible.
9 Q. Would you post a link to a post about
02:20 10 hard forks on your Slack channel?
11 A. Probably.
12 Q. So this post, why did you make this
13 post?
14 A. To let people know that this is
02:20 15 something we were proposing.
16 Q. "This" being the hard fork?
17 A. Yes.
18 Q. What is a hard fork?
19 A. It's when there's a proposed change
02:20 20 to the blockchain consensus rule.
21 Q. Is that ultimately a code change to a
22 repository?
23 A. What do you mean, ultimately?
24 Q. Sure.
02:21 25 If there is a change to the consensus

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02:21 1 rules, does that represent a change in computer
2 code for the protocol?

3 MR. DIXON: Objection as to form.

4 A. That's -- that's part of it.

02:21 5 Q. What else is part of it?

6 A. People running that code.

7 Q. What do you mean by "running"?

8 A. Running to -- like execute it, like
9 the computer executing the code.

02:22 10 Q. And this HF1807 was proposed by LBRY;
11 is that correct?

12 A. Yes.

13 Q. And did LBRY draft the code changes?

14 MR. DIXON: Objection as to form.

02:22 15 A. No.

16 Q. Who did?

17 A. I think it was -- I don't remember
18 exactly who wrote this.

19 Q. What did HF1807, the hard fork, do?

02:23 20 A. I don't remember. But I can read
21 this.

22 Q. Sure. See if it refreshes your
23 recollection.

24 A. It extended how long claims are valid
02:23 25 for before they expire.

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02:23 1 Q. Why was LBRY proposing this change?

2 A. We thought it was a good idea for the
3 protocol.

4 Q. Why was it a good idea for the
02:23 5 protocol?

6 A. We didn't think it made sense for
7 claims to expire.

8 Q. Under "What's changing," in the
9 fourth line, it says, "Any claims that expire
02:23 10 before the fork takes effect will stay expired."

11 Do you see that?

12 A. Mm-hmm.

13 Q. It says, "We will republish them
14 manually to preserve access to that content."

02:23 15 Do you see that?

16 A. Yes.

17 Q. The "we," is that LBRY?

18 A. I think so.

19 Q. Down at the bottom, there's a --

02:24 20 right above "Fork details," it says, "We will
21 post updates about this fork to this page. If
22 you want to be notified of news about this fork
23 and future forks, please join the fork e-mailing
24 list."

02:24 25 Do you see that?

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02:24 1 A. Yes.

2 Q. Who operated the fork mailing list?

3 A. LBRY.

4 Q. There's a reference above that too,

02:24 5 the releases page.

6 Do you see that?

7 A. Yes.

8 Q. What's that?

9 A. It's a page where you can get a

02:24 10 compiled version of the code.

11 Q. Is that on LBRY's website?

12 A. I don't remember.

13 Q. How many hard forks have there been,

14 to the LBRY blockchain?

02:25 15 A. I'm not sure.

16 Q. Is that more than ten?

17 A. No.

18 Q. More than five?

19 A. I'm not sure.

02:25 20 Q. You are pretty confident it's ten or

21 less?

22 A. Yeah.

23 Q. Is a hard fork significant?

24 MR. DIXON: Objection as to form.

02:26 25 A. In what sense?

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02:27 1 Q. Is a hard fork significant to you?

2 MR. DIXON: Objection as to form.

3 A. Yes.

4 Q. Now, are all changes to the
02:27 5 blockchain code become a hard fork?

6 A. No.

7 Q. Are there soft forks?

8 A. Yes.

9 Q. What is a soft fork?

02:27 10 A. It's a fork where the new rules are
11 backwards compatible.

12 Q. What does that mean?

13 A. If you are running a version that
14 didn't accept the fork, it still works. It's --
02:28 15 sorry, it's still part of the same chain.

16 Q. And has there been soft forks to the
17 LBRY blockchain?

18 MR. DIXON: Objection as to form.

19 A. I don't remember.

02:28 20 Q. Just please bear with me on these
21 type of questions.

22 So the blockchain was launched in
23 about June of 2016, correct?

24 A. Yes.

02:28 25 Q. There have been less than ten hard

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02:41 1 LBRY's master copy of the blockchain code?

2 MR. DIXON: Objection as to form.

3 A. Yes.

4 Q. So they could merge the files in

02:41 5 LBRY's master copy?

6 A. Yes.

7 Q. And that person was at LBRY at the
8 time?

9 A. Yes.

02:41 10 Q. So, has anyone found a bug in LBRY's
11 blockchain code and brought it to your attention
12 that was not at LBRY?

13 A. Maybe. I don't remember a specific.

14 Q. Above the header "Fork Details,"
02:42 15 there's two sort of paragraphs above that, it
16 says, "If you have published content to LBRY,
17 there's a very small chance that the fork will
18 cause your claims to experience more competition
19 and then they stop being the highest amount
02:42 20 claims for their name. This effect less than
21 0.2 percent of claims," and then it says,
22 "(until the 1,000 out of 640,000)."

23 Do you see that?

24 A. Yes.

02:42 25 Q. What is a claim?

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02:42 1 A. A claim is a record in the
2 blockchain.
3 Q. What does the record signify?
4 A. A piece of published content.
02:42 5 Q. For every published content, is there
6 a claim?
7 A. Yes.
8 Q. And for every claim, there's a
9 published content?
02:43 10 A. No.
11 Q. When are there claims without
12 published content?
13 A. When someone makes one that way.
14 Q. So a claim is as to what? What are
02:43 15 people claiming?
16 A. What do you mean?
17 Q. Well, I'm just looking at the word
18 claim like it's somebody claims something,
19 right.
02:43 20 A. Oh.
21 Q. So I don't know if this is used in
22 such a fashion, that it is somebody who is
23 claiming something.
24 Is that how the word is used?
02:43 25 A. Yes.

CONFIDENTIAL

02:43 1 Q. So what is someone claiming when they
2 make a claim?

3 A. A name.

4 Q. A name for content?

02:44 5 A. Yes.

6 Q. So someone can actually claim a name
7 but not publish content, correct?

8 A. Yes.

9 Q. But somebody can't publish content
02:44 10 without claiming a name for that content?

11 A. Yes.

12 Q. What is the minimum -- are claims
13 made in LBC?

14 A. Yes.

02:44 15 Q. Can they be made in anything other
16 than LBC?

17 A. No.

18 Q. What is the minimum amount of LBC
19 needed to make a claim?

02:44 20 A. I don't know.

21 Q. Is there a maximum amount of LBC that
22 can be used to make a claim?

23 A. Yes.

24 Q. What is that?

02:44 25 A. I don't know.

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02:46 1 October 30, 2019."

2 Do you see that?

3 A. Yes.

4 Q. And this is a post that you made on
02:47 5 or about October 3, 2019, correct?

6 A. Yes.

7 Q. Why are you making this announcement?

8 A. To let people know about a proposed
9 hard fork.

02:47 10 Q. Did any proposed hard fork -- sorry.

11 Did any hard fork proposed by LBRY

12 not get adopted by the network?

13 MR. DIXON: Objection as to form.

14 A. I can't think of one.

02:47 15 Q. Who else besides LBRY proposed hard
16 forks to the LBRY blockchain, if anyone?

17 A. I can't think of one.

18 Q. I'm not going to ask you about Merkle
19 tree crews (phonetic). We can skip over that.

02:48 20 Let's get down to about the middle of
21 the page, where there's -- it begins "HF1910.
22 We'll activate on the main net at height
23 658300."

24 Do you see that?

02:48 25 A. Yes.

CONFIDENTIAL

03:02 1 LBRY stack and the desktop application is under
2 the LBRY stack, correct?

3 A. Yes.

4 Q. Does the YouTube Sync program also
03:02 5 sync content to LBRY?

6 A. Yes.

7 Q. I mean, essentially, it syncs it to
8 the LBRY network, right, not specifically to
9 anything that is Odysee?

03:02 10 A. Yes.

11 Q. And can you tell me mechanically, as
12 much as possible, in layman's term, how the
13 YouTube Sync programs works? How does it -- if
14 John, for example, has a great YouTube channel,
03:03 15 how does it get from YouTube onto the LBRY
16 network? What does John have to do?

17 MR. DIXON: Objection as to form.

18 A. He has to go to the YouTube Sync page
19 and sign up for the program.

03:03 20 Q. What happens after he signs up for
21 the program?

22 A. The YouTube Sync system downloads his
23 content and publishes it to LBRY.

24 Q. YouTube Sync program downloads the
03:03 25 content, is that what you said?

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03:03 1 A. YouTube Sync system.
2 Q. YouTube Sync system.
3 What is the YouTube Sync system?
4 A. It's a set of servers that do this.
03:04 5 Q. Running software on them?
6 A. Yes.
7 Q. So the servers download the content
8 from YouTube servers, correct?
9 A. Yes.
03:04 10 Q. And then make it -- and then publish
11 that content to the LBRY network, correct.
12 A. Yes.
13 Q. So the blockchain doesn't actually
14 host content, correct?
03:04 15 A. Yes.
16 MR. DIXON: Objection as to form.
17 Q. Because it's not actually stored on
18 the blockchain, it's not on the distributed
19 ledger on the blockchain, correct?
03:04 20 A. That's correct.
21 Q. It sort of tells and maps out where
22 to get the content and the rules by which
23 somebody can access the content, correct?
24 MR. DIXON: Objection as to form.
03:04 25 A. Roughly.

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03:05 1 Q. So the YouTube Sync systems servers
2 are owned by LBRY; is that correct?

3 A. Odysee.

4 Q. Today they're owned by Odysee?

03:05 5 A. Yes.

6 Q. And previously, they were owned by
7 LBRY?

8 A. Yes.

9 Q. So there was a -- sort of an asset
03:05 10 transfer of servers, at least at some point,
11 within the last year?

12 MR. DIXON: Objection as to form.

13 A. What's an asset transfer?

14 Q. The ownership of the servers for the
03:05 15 YouTube Sync system, transferred from LBRY to
16 Odysee at some point in the last year?

17 A. Yes.

18 MR. DIXON: Objection as to form.

19 Q. Why was that done?

03:05 20 A. It made sense for Odysee to do this.

21 Q. To own the servers?

22 A. Yes.

23 Q. Why did it make sense?

24 A. It fits better with what Odysee is
03:06 25 doing.

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03:14 1 in terms of features for a video watching
2 application?

3 A. I think that there's no one feature
4 that's centralized or not. It's -- it's a
03:14 5 spectrum. It's not like this or not.

6 Q. Would you agree that Odysee has
7 centralized features?

8 A. Yes.

9 Q. What are some of those centralized
03:14 10 features?

11 A. Like Odysee's code can only be
12 modified by Odysee. That would make something
13 more centralized.

14 Q. Anything else?

03:15 15 A. Odysee -- some of Odysee's code is
16 close source.

17 Q. Anything else?

18 A. It's kind of hard to say.

19 Q. What about what the -- what content
03:16 20 is displayed on Odysee's website, would that be
21 a centralized feature if they could control
22 what's being displayed?

23 MR. DIXON: Objection as to form.

24 A. That would make something more
03:16 25 centralized.

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03:17 1 are either for the reflectors or the hub or
2 video CDN?

3 MR. DIXON: Objection as to form.

4 A. No.

03:18 5 Q. So there are stand-alone servers for
6 the YouTube Sync system; is that correct?

7 MR. DIXON: Objection as to form.

8 A. I think so.

9 Q. And in terms of what gets recorded on
03:18 10 the blockchain for the YouTube Sync system, when
11 a video is published and claim made, is there
12 any annotation on the blockchain that it's part
13 of the YouTube Sync system?

14 MR. DIXON: Objection as to form.

03:18 15 A. I'm pretty sure it's in the
16 description.

17 Q. So there's a -- there's a field that
18 says, "Description" and it will say that it's
19 part of the YouTube Sync system?

03:19 20 A. There's -- I think there's a link to
21 the YouTube video.

22 Q. Why is there link to the YouTube
23 video?

24 A. As -- as -- probably as reference
03:19 25 from where it came from.

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03:24 1 Q. Is that Odysee user data?
2 A. I'm not sure.
3 Q. Back to the YouTube Sync system.
4 Who pays for the publishing for the
03:24 5 videos that are copied and downloaded from
6 YouTube?
7 MR. DIXON: Objection as to form.
8 A. Odysee.
9 Q. And before Odysee, it was LBRY?
03:24 10 A. Yes.
11 Q. It's not the YouTubers themselves?
12 A. No. Unless they're running it.
13 Q. Could they run their -- the YouTube
14 Sync system?
03:25 15 A. Yeah. It's open source.
16 Q. How many YouTubers do you know are
17 running the YouTube Sync system on LBRY servers
18 or on Odysee servers?
19 A. I don't think any of them are running
03:25 20 Odysee servers.
21 MR. MOORES: Can we go off the
22 record. Take a break.
23 VIDEOGRAPHER: The time right now is
24 3:25 p.m. We are off the record.
03:25 25 (At this time, a discussion

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03:25 1 was held off the record.)
2 VIDEOGRAPHER: Time right now is
3 3:38 p.m. We are back on the record.
4 BY MR. MOORES:
03:38 5 Q. Before we broke, we were talking
6 about Exhibit number 99. I'd like to go back --
7 excuse me -- to Exhibit 99.
8 In the -- in the meantime, who
9 created the YouTube Sync system?
03:38 10 A. LBRY.
11 Q. How much LBC is required to operate
12 the YouTube Sync system?
13 MR. DIXON: Objection as to form.
14 A. I don't know.
03:38 15 Q. If -- is that recorded somewhere?
16 Broken out in LBRY's ledger, as to how much LBC
17 is used the YouTube system?
18 MR. DIXON: Objection as to form.
19 A. I'm not sure.
03:39 20 Q. Is there anyone who would know that,
21 that you're aware?
22 A. No.
23 Q. So looking back at Exhibit number 99.
24 There's a reference to moving more of the
03:39 25 infrastructure out of AWS and into the bunker to

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03:42 1 Q. What was that?

2 A. I don't remember.

3 Q. Was there a blockchain emergency that

4 had to be fixed with a hard fork?

03:42 5 A. I don't think so.

6 Q. There's a reference to LBRY TV in

7 your e-mail. A few -- one dash up from the hard

8 fork emergency.

9 Do you see that?

03:42 10 A. Yes.

11 Q. What is LBRY TV?

12 A. It's a web service where people can

13 watch videos that are on LBRY.

14 Q. Is it similar to Odysee?

03:43 15 A. Yes.

16 Q. Does it currently exist?

17 A. No.

18 Q. What happened to it?

19 A. We shut it down.

03:43 20 Q. "We" is who?

21 A. LBRY.

22 Q. Whose decision was it to shut down

23 LBRY TV?

24 A. I don't remember exactly.

03:43 25 Q. Was it a collective decision of the

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03:52 1 Q. It says "We got 51 percent attacked
2 on the LBRY chain. Attacker exploited at least
3 one exchange, potentially three. We fought him
4 off and made him spend a ton of BTC. Maybe all
03:52 5 he earned?"

6 A. Right.

7 Q. Do you see that?

8 A. Yes.

9 Q. And then he writes, "Monitored and
03:52 10 cleaned up from attack. Helped upgrade SPV
11 servers on Odysee."

12 A. Right.

13 Q. Does this refresh your recollection
14 as to what the blockchain attack was?

03:52 15 A. Yes.

16 Q. What is a 51 percent attack?

17 A. It's when someone controls more than
18 half the hash rate that's mining the chain.

19 Q. And that's bad?

03:53 20 A. It would let them, like unilaterally
21 make changes.

22 Q. To the blockchain?

23 A. Yes.

24 Q. Including the sort of ownership of
03:53 25 LBC?

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03:53 1 A. Of some of the LBC. Like their LBC.
2 Q. Whose LBC?
3 A. The -- the person who controls that.
4 The hash rate.
03:53 5 Q. So they can -- I'm sorry.
6 What can they do with LBC?
7 A. They can go back in the history of
8 the blockchain.
9 Q. And rewrite who owns LBC?
03:53 10 A. Just their L --
11 Q. So what impact would that have?
12 A. They could spend LBC, then go back in
13 history and spend LBC again.
14 Q. Sounds bad.
03:54 15 All right. So the attacker exploited
16 at least one exchange.
17 What does that mean?
18 A. That they spent LBC on an exchange,
19 then rolled it back and then spent LBC on an
03:54 20 exchange again.
21 Q. So essentially, the traded the same
22 LBC for say Bitcoin more than once?
23 A. Right.
24 Q. Tom writes, "We fought him off."
03:54 25 Were you part of the fighting off the

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03:54 1 blockchain attack?

2 A. Yes.

3 Q. What did you do?

4 A. We outbid him for the hash rate he

03:55 5 was using.

6 Q. What does that mean?

7 A. He was renting hash rate on a hash

8 rate marketplace. And we outbid him for the

9 hash rate.

03:55 10 Q. So he wasn't sort of mining more than

11 51 percent, he was buying other people's hash

12 rate mining?

13 A. Yes.

14 Q. And how was this attack discovered by

03:55 15 LBRY?

16 A. We have a system that monitors the

17 blockchain for large reorgs and we noticed a

18 large reorg.

19 Q. So you spent LBC to outbid the hash

03:55 20 rate?

21 A. No.

22 Q. What did you spend to outbid for the

23 hash?

24 A. Bitcoin.

03:56 25 Q. Did that cost a lot of Bitcoin?

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03:56 1 A. I don't remember how much it cost.
2 Q. How long did it take to outbid the
3 attacker?
4 A. A few hours.
03:56 5 Q. Did that mean that you were then
6 mining LBC yourself? Sorry.
7 Did that mean that LBRY was mining
8 LBC at that time?
9 A. No.
03:56 10 Q. Did LBRY earn any LBC for paying for
11 all that hash rate?
12 MR. DIXON: Objection to the form.
13 A. I think so.
14 Q. Whose decision was it to fight him
03:57 15 off?
16 A. It may have been mine.
17 Q. Why did you want to fight him off?
18 A. He was doing something that is
19 against what LBRY users would want.
03:57 20 Q. Did you -- I'm sorry.
21 Did LBRY publicize its successful
22 defense of the blockchain?
23 MR. DIXON: Objection to the form.
24 A. I don't remember us doing that.
03:58 25 Q. So no post or anything about it?

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04:01 1 A. Right.

2 Q. So was there any effort to fix that,
3 like, double sale?

4 MR. DIXON: Objection to the form.

04:01 5 A. It depends on how it worked at the
6 exchange, like whether they managed to catch it
7 in time or not.

8 Q. So do you know if they -- if the
9 exchange caught it in time?

04:01 10 A. I think some of them may and some of
11 them may not. I'm not sure. But I think we did
12 offer to give them LBC if they lost any.

13 Q. So LBRY offered to make the exchange
14 whole, essentially?

04:02 15 MR. DIXON: Objection to the form.

16 A. I don't know exactly what the -- the
17 conversation was.

18 Q. Who communicated to the exchanges?

19 A. It was probably Tom or Josh.

04:02 20 Q. Were you copied on any e-mails with
21 the exchanges?

22 A. Probably.

23 Q. Have you communicated with exchanges
24 in the past?

04:02 25 A. Yes.

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04:03 1 Q. Which exchanges have you communicated
2 with?

3 A. With Bittrex. There may have been
4 others. I don't remember.

04:03 5 Q. What were you communicating with
6 Bittrex about?

7 A. They had a problem with their LBRY
8 CRD instance.

9 Q. Is that L-B-R-Y, C-R-D?

04:03 10 A. Yes.

11 Q. And what did you do for them?

12 A. I talked to them about what might fix
13 it.

14 Q. And was the problem ultimately fixed?

04:03 15 A. Yes.

16 Q. Did anyone else at LBRY get involved
17 in fixing the problem?

18 A. Yes.

19 Q. Who was that?

04:04 20 A. Brannon.

21 Q. King?

22 A. Yes.

23 Q. Just looking a back at Exhibit 100,
24 the page ending 838, sort of middle of the page,
04:04 25 there's a reference to "Turn off 3X rewards for

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1 identification.)

2 (Exhibit 102 was marked for

3 identification.)

4 Q. Sir, you've just been handed what has
04:07 5 been marked as Exhibit number 102. It's a
6 multiple-page document beginning on Bates number
7 LBRY_000523. It is -- purports to be an e-mail
8 from yourself sent to a Job Evers-Meltzer.
9 Which is E-V-E-R-S, hyphen, M-E-L-T-Z-E-R. It
04:08 10 is dated December 22, 2016. And the subject is
11 "Needing an open beta."

12 Do you see Exhibit number 102?

13 A. Yes.

14 Q. So this references a conversation --
04:08 15 communication back and forth with Job
16 Evers-Meltzer; is that right?

17 A. Yes.

18 Q. And who is Evers-Meltzer?

19 A. He worked at LBRY.

04:08 20 Q. And there's also a reference down
21 here to Jack Robison.

22 A. Right.

23 Q. And I think you've already testified
24 about him today, right?

04:08 25 So one of the questions I have for

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04:17 1 places.

2 Q. Why did you share this with the
3 public?

4 A. It's nice to celebrate.

04:17 5 Q. To celebrate your accomplishments?

6 A. I would say --

7 MR. DIXON: Objection to the form.

8 A. -- to celebrate everyone's
9 accomplishments.

04:17 10 Q. Looking at the first item on the
11 timeline here, in the X axis, "June 2016, first
12 LBRY blockmine."

13 Do you see that?

14 A. Yes.

04:18 15 Q. Is that the premine?

16 A. No.

17 Q. What's the first block?

18 A. It's the first block in the
19 blockchain.

04:18 20 Q. The Genesis Block is not the first
21 block?

22 A. No.

23 Q. What's the Genesis Block?

24 A. Like the zero block.

04:18 25 Q. All right. So the premine was

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04:18 1 blocked in the zero block?

2 A. Yes.

3 Q. So the first block is mined by
4 somebody other than LBRY; is that right?

04:18 5 A. No.

6 Q. So LBRY mined the first block?

7 A. Yes.

8 Q. LBRY mined the zero block --

9 A. Nobody mined the zero block.

04:18 10 Q. You just -- you just get it?

11 A. It's hardcoded.

12 Q. So LBRY mined the first block.

13 And did it -- concurrently, it

14 received the LBC from the Genesis Block?

04:19 15 MR. DIXON: Objection to the form.

16 A. No.

17 Q. So how did -- when did LBRY receive
18 its premine?

19 A. Never. It's kind of always had it.

04:19 20 Q. So there's 400 million LBC in the
21 premine, correct?

22 A. Yes.

23 Q. When is the first time LBRY had
24 possession of those 400 million LBC?

04:19 25 A. When it hardcoded them.

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04:19 1 Q. And when did it hardcode them?

2 A. I don't know when the code was
3 written.

4 Q. So if you go to the Block Explorer,
04:20 5 when would it say that LBRY possessed the
6 premine for the first time?

7 MR. DIXON: Objection to the form.

8 A. I don't know if it says things like
9 that.

04:20 10 Q. It says the start date for what's
11 been recorded, correct?

12 MR. DIXON: Objection to the form.

13 A. Yes, I guess.

14 Q. So when is the first time that LBRY
04:20 15 could have transferred any of its LBC from the
16 premine?

17 MR. DIXON: Objection to the form.

18 A. I think it would be the first block.
19 Unless there was some kind of time block on it.

04:20 20 Q. So prior to June of 2016, could LBRY
21 have transferred LBC from its premine to a
22 third-party?

23 A. No.

24 Q. Prior to -- and that would be the
04:21 25 date of the launch of the -- of the protocol; is

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04:21 1 that right?

2 A. I'm not sure if that's how we've
3 always talked about it. But I think of the
4 launch of the blockchain as being the first

04:21 5 block.

6 Q. The launch of the blockchain is the
7 first block?

8 A. Yes.

9 Q. And prior to that, did LBRY ever
04:21 10 promise anyone LBC?

11 A. Well, there was one you showed me.
12 Right?

13 Q. Right.

14 Like if you sign up, you are an alpha
04:22 15 tester, we'll give you a thousand LBC?

16 A. If you call it a promise, then --
17 then yes.

18 Q. It's at least an offer for someone to
19 get a thousand LBC for being an alpha tester,
04:22 20 correct?

21 MR. DIXON: Objection to the form.

22 A. I -- I guess.

23 Q. So there's a reference here to -- in
24 September of 2017, I'm talking about on
04:22 25 Exhibit 104, that LBC tipping goes live.

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04:25 1 Is that the same as payment for the
2 video content?

3 A. No.

4 Q. What is payment for video content?

04:25 5 A. Payment is when there's a claim that
6 says it requires a payment. And then you send
7 the payment to the address that's listed there.

8 Q. So when the publisher publishes
9 content and makes a claim in connection with the
04:26 10 published, it can dictate whether or not a
11 payment is required for a consumer to access the
12 content?

13 A. Right.

14 Q. And in terms of the YouTube Sync
04:26 15 program, did LBRY require payment for content
16 that was copied through the YouTube Sync system?

17 A. No.

18 MR. DIXON: Objection to the form.

19 Q. Is payment available through all of
04:26 20 the LBRY applications over time?

21 MR. DIXON: Objection to the form.

22 A. No.

23 Q. Which ones was it not available?

24 A. Spe.ch.

04:27 25 Q. Was it available on LBRY TV?

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04:28 1 mobile application at the point that Odysee
2 started?

3 A. Yes.

4 Q. When LBRY or Odysee publishes
04:28 5 content, does it require payment?

6 MR. DIXON: Objection to the form.

7 A. Maybe sometimes.

8 Q. Can you remember a piece of content
9 that LBRY published that when it was completing
04:29 10 the claim, it required payment?

11 A. Yes.

12 Q. What was that?

13 A. It's a video that Jeremy published.
14 To show that people can pay for videos.

04:29 15 Q. Besides that sort of exemplar
16 published by LBRY, can you think of any other
17 content that LBRY published that wasn't free
18 content?

19 A. I published content that wasn't free.

04:29 20 Q. On behalf of the company or you
21 personally?

22 A. I guess me personally. I can't think
23 of another one.

24 Q. In terms of what's recorded on the
04:30 25 blockchain, is whether or not a payment has been

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04:30 1 made recorded on the blockchain?

2 A. Yes.

3 Q. And there's a field where it's

4 designated as a payment as opposed to say a tip?

04:30 5 A. Yes.

6 Q. In terms of tipping, how was that
7 recorded on the blockchain as opposed to some
8 other transfer of LBC from person X to person Y?

9 A. Tip is a support claim where the
04:30 10 person that you are tipping is the one that can
11 spend it.

12 Q. So how does that differ if I was to
13 transfer John Dixon ten LBC from my digital
14 wallet to his digital wallet?

04:31 15 A. That wouldn't be a claim at all.
16 That would just be a transaction.

17 Q. So a claim is designated as such on
18 the blockchain, correct?

19 A. Yes.

04:31 20 Q. And a payment is designated as what
21 on the blockchain?

22 A. A payment is a transaction.

23 Q. Is that the same as me sending to
24 John ten LBC because he did something cool?

04:31 25 A. There's extra info that says it's a

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04:31 1 payment.

2 Q. So there is -- there is information
3 on the blockchain which designates that it's a
4 payment?

04:31 5 A. Yes.

6 Q. Are there other types of supports
7 other than tips?

8 A. Yes.

9 Q. What are those?

04:32 10 A. There's like just supports.

11 Q. The Venn diagram of supports, there's
12 the big box which is supports and then within
13 that is tips?

14 A. Yes.

04:32 15 Q. But then outside of the tips, is just
16 supports?

17 A. Yes.

18 Q. And what are just supports?

19 A. It's a support where you retain the
04:32 20 ability to spend it.

21 Q. You the person who --

22 A. The person who sent it.

23 Q. Now, is it actually sent?

24 A. So no, it's not sent.

04:32 25 Q. It just recorded on the blockchain as

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04:32 1 a support, but it's the -- the possession of the
2 LBC stays with me; is that correct?

3 A. Yes.

4 Q. I can terminate the support at any
04:32 5 time?

6 A. Yes.

7 Q. So I can run like a -- a query, a
8 ChainQuery and figure out how many supports I've
9 tendered to somebody else if I want to?

04:33 10 A. Yes.

11 Q. And I would do that based upon my
12 digital asset -- I'm sorry, digital asset wallet
13 address?

14 A. Yes.

04:33 15 Q. So, for example, if I wanted to
16 figure out how many LBC LBRY has provided in
17 supports, I can type in or filter by LBRY's
18 wallet addresses and that would tell me how many
19 supports LBRY has at any given time?

04:33 20 A. Yes.

21 MR. DIXON: Objection to the form.

22 Q. And in terms of historical data, all
23 of the supports that have already been made
24 through the LBRY blockchain is recorded?

04:33 25 A. Yes.

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04:33 1 Q. So in theory, I can -- say as of
2 January 1, 2020, I can run a query and figure
3 out how many supports are currently, or then in
4 place on the LBRY blockchain?

04:34 5 A. Yes.

6 Q. When did just supports start?

7 A. They've always been there.

8 Q. So it was always available?

9 A. Yes.

04:34 10 Q. And -- and non-tipping supports were
11 always available through LBRY applications?

12 A. I'm not sure if there was ever a time
13 when they weren't.

14 Q. So the desktop application, for
04:34 15 example, as far as you can remember, you could
16 always support a publisher?

17 A. Yes.

18 Q. It just took a little while for -- at
19 least tipping to be supported by the LBRY
04:35 20 applications?

21 A. Yes. But it was always possible on
22 the blockchain.

23 Q. So we covered payments, tips,
24 supports, claims.

04:35 25 What other ways --

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04:35 1 A. You're like an expert now.

2 Q. What other ways can one use LBC
3 through a LBRY application?

4 A. I'm not thinking of anything.

04:36 5 Q. And so if -- if I was looking at the
6 blockchain, just looking at it, and I --
7 five minutes before had transferred to John ten
8 LBC because, again, he had done something cool,
9 you are saying that that would be recorded
04:36 10 differently than a payment, a tip, and support
11 or a claim?

12 A. Yes.

13 Q. Would that transfer of LBC, it would
14 be recorded on the chain, though, correct?

04:36 15 A. Yes.

16 Q. So on Exhibit number 104, in June of
17 2019, there's a reference to one million claims
18 made.

19 Is that claims similar to what we had
04:37 20 described before as someone claiming a --
21 address on the chain?

22 A. Claiming a name.

23 Q. Sorry. Claiming a name.

24 A. Yes.

04:37 25 Q. Live streaming released, which

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06:09 1 A. This fall sometime.
2 Q. Fall of 2021?
3 A. Yeah. Around there. Could have been
4 a little earlier.
06:09 5 Q. So at least within the year of 2021?
6 A. Yes.
7 Q. Who is Oleg Siskin?
8 A. He did some work for LBRY at some
9 point.
06:09 10 Q. "Work for LBRY," meaning LBRY paid
11 him for work?
12 A. I'm not sure if we paid him.
13 Q. Who is Jeffrey Picard?
14 A. He works for LBRY.
06:09 15 Q. You mentioned a Mark Femur (phonetic)
16 beforehand; is that right?
17 A. Yes.
18 Q. Who is Neill Miller?
19 A. He used to work for LBRY.
06:09 20 MR. MOORES: Neill is with two Ls,
21 for the record.
22 Q. Who is Kok-Pin Yeoh?
23 A. He works for Odyssey.
24 MR. MOORES: That's K-O-K, hyphen,
06:10 25 P-I-N. Last name Y-E-O-H. For the record.

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06:10 1 Q. Who is Liam Cardenas?
2 A. He used to work for LBRY.
3 MR. MOORES: For the record,
4 C-A-R-D-E-N-A-S.
06:10 5 Q. Who is Travis Eden?
6 A. He used to work for LBRY.
7 Q. Who's Xander Luciano?
8 A. He used to work for Odysee.
9 Q. Who is Paul Webb?
06:10 10 A. He used to work for LBRY.
11 Q. Who is Anthony Mayfield?
12 A. I believe he works for LBRY -- for
13 Odysee.
14 Q. Who is Igor Gassmann?
06:10 15 A. He used to work for LBRY.
16 Q. Who is Zhu Dung Li (phonetic)?
17 A. I think that's Roy.
18 Q. And who is Johnny Nelson?
19 A. He works for Odysee.
06:11 20 Q. Have you ever participated in a LBRY
21 program by which you purchased LBC?
22 A. Yes.
23 Q. When did you first participate?
24 A. Sometime last year, I believe.
06:11 25 Q. In 2021?